

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
(SOUTHERN DISTRICT)**

HAGERSTOWN RECOVERY LLC
DBA THE VALLEY

v.

NEW SPIRIT RECOVERY LLC *et. al.*

Case No.: 8:25-cv-01252-DKC

* * * * *

CONSENT MOTION TO EXTEND TIME TO REPLY

TO THE HONORABLE JUDGES OF SAID COURT:

COMES NOW, the Plaintiff, Hagerstown Recovery LLC DBA The Valley (hereinafter, “The Valley”), by and through undersigned counsel, Benajamin Kurtz, and the law firm of Kurtz, Peters and Associates LLC., moves to extend the time to file the response to the Defendants’ New Spirit Recovery’s Motion to Dismiss (ECF 14) and for reasons states as follows:

1. Defendant filed the Motion to Dismiss on June 18, 2025.
2. The Plaintiff’s current deadline to respond to the Motion to Dismiss is July 7, 2025.
3. The Plaintiff seeks an extension of 30 days up to and including August 7, 2025, to file its responsive pleading.
4. The parties are engaged in settlement negotiations.
5. The Plaintiff requires an additional thirty (30) days to respond to the Defendant’s (New Spirit -ECF 14) Motion to Dismiss partly due to some of the co-conspirators evading being served with the amended complaint.
6. Defense Counsel has consented to this motion.

7. This motion is not being made to prejudice a party or for undue delay and in fact no prejudice to any party, nor will, an undue delay occur.

WHEREFORE, the Plaintiff prays this Honorable Court pass an Order:

1. Extending the time for the Plaintiff's response to motion to dismiss (ECF 14) from July 7, 2025, to August 7, 2025.

Respectfully submitted,

KURTZ, PETERS & ASSOCIATES LLC.

By: /s/ *Benjamin M. Kurtz*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of June 2025, a copy of this Motion for Extension of Time was filed and served, electronically, via this Court's CM/ECF e-filing system, on all counsel of record.

/s/ Benjamin M. Kurtz

Benjamin M. Kurtz, Esquire